

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA**

IN RE:)	
)	Case No: 7:23-cv-00897
CAMP LEJEUNE WATER LITIGATION)	
)	JOINT MOTION FOR EXTENSION OF
This Document Relates To:)	PHASE III DEADLINES FOR TRACK 1
)	PARKINSON’S DISEASE PLAINTIFFS
<i>Edgar Peterson, IV v. U.S.</i> , 7:23-CV-1576)	
<i>Gary McElhiney v. U.S.</i> , 7:23-CV-1368		
<i>Diane Rothchild v. U.S.</i> , 7:23-CV-858		
<i>Robert Welch v. U.S.</i> , 7:23-CV-1503		
<i>Richard Sparks v. U.S.</i> , 7:23-CV-682		

Pursuant to Federal Rules of Civil Procedure 6(b)(1) and 16(b)(4), and good cause having been shown, the United States and the Plaintiffs’ Leadership Group (“PLG”) (collectively, “the Parties”) jointly move this Court to extend the time for the completion of Phase III Expert Discovery for all Track 1 Trial Cases alleging Parkinson’s Disease by 30 days. The extension would apply to all experts offering opinions in Phase III as it relates to the five Parkinson’s Disease Plaintiffs in Track 1 listed above.

The United States made PLG and the Court aware at the January 13, 2025 Status Conference that its Parkinson’s Disease expert had an unexpected medical event. See ECF No. 315 at 3:15-19. As a result, the United States’ expert is no longer available and the United States had to unexpectedly retain new experts to opine on the medical conditions of the five Parkinson’s Disease Plaintiffs. In addition to these new medical experts’ opinions, the United States has additional experts whose opinions rely on the opinions of the medical experts. The Parties agree that a 30-day extension is reasonable given the above circumstances.

The Parties will work collaboratively to schedule the depositions of both Parties’ experts throughout the June 13 to August 12 time period to prevent the depositions of all of the Phase III

Parkinson's Disease experts from taking place on the eve of both Parties' briefing deadline. Both Parties have committed to scheduling their experts' depositions as early as is practically possible given the Parties' and experts' schedules.

The United States also agrees to immediately disclose the number of Phase III Parkinson's Disease testifying experts, and to further disclose the names and CVs of such testifying experts on or before April 8, 2025.

A proposed order is attached.

DATED this 7 day of March 2025. Respectfully submitted,

/s/ J. Edward Bell, III

J. Edward Bell, III (admitted *pro hac vice*)
Bell Legal Group, LLC
219 Ridge St.
Georgetown, SC 29440
Telephone: (843) 546-2408
jeb@belllegalgroup.com *Lead Counsel for Plaintiffs*

/s/ Zina Bash

Zina Bash (admitted *pro hac vice*) Keller
Postman LLC
111 Congress Avenue, Ste. 500
Austin, TX 78701
Telephone: 956-345-9462
zina.bash@kellerpostman.com
Co-Lead Counsel for Plaintiffs and Government Liaison

/s/ Robin Greenwald

Robin L. Greenwald (admitted *pro hac vice*)
Weitz & Luxenberg, P.C.
700 Broadway
New York, NY 10003 Telephone: 212-558-
5802 rgreenwald@weitzlux.com
Co-Lead Counsel for Plaintiffs

Yaakov M. Roth

Acting Assistant Attorney General
Civil Division

J. PATRICK GLYNN

Director, Torts Branch
Environmental Torts Litigation Section

BRIDGET BAILEY LIPSCOMB

Chief, Camp Lejeune Unit
Torts Branch, Civil Division

/s/ Adam Bain

ADAM BAIN
Senior Trial Counsel, Torts Branch
Environmental Tort Litigation Section United
States Department of Justice
P.O. Box 340, Ben Franklin Station
Washington, D.C. 20044
E-mail: adam.bain@usdoj.gov
Telephone: (202) 616-4209
Fax: (202) 616-4473

ANNA ELLISON

ELIZABETH PLATT

/s/ Elizabeth Cabraser

Elizabeth Cabraser (admitted *pro hac vice*)
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
275 Battery Street, Suite 2900 San Francisco,
CA 94111 Phone (415) 956-1000
ecabraser@lchb.com
Co-Lead Counsel for Plaintiffs

Trial Attorneys, Torts Branch Environmental
Torts Litigation Section
*Counsel for Defendant United States of
America*

/s/ W. Michael Dowling

W. Michael Dowling (NC Bar No. 42790) The
Dowling Firm PLLC
Post Office Box 27843 Raleigh, North
Carolina 27611 Telephone: (919) 529-3351
mike@dowlingfirm.com
Co-Lead Counsel for Plaintiffs

/s/ James A. Roberts, III

James A. Roberts, III (N.C. Bar No.: 10495)
Lewis & Roberts, PLLC
3700 Glenwood Avenue, Suite 410
P.O. Box 17529 Raleigh, NC 27619-7529
Telephone: (919) 981-0191
Fax: (919) 981-0199
jar@lewis-roberts.com
Co-Lead Counsel for Plaintiffs

/s/ Mona Lisa Wallace

Mona Lisa Wallace (N.C. Bar No.: 009021)
Wallace & Graham, P.A.
525 North Main Street
Salisbury, North Carolina 28144
Tel: 704-633-5244
Co-Lead Counsel for Plaintiffs

/s/ Hugh R. Overholt

Hugh R. Overholt (NC Bar No. 016301)
Ward and Smith P.A.
Post Office Box 867
New Bern, NC 28563-0867
Telephone: (252) 672-5400
hro@wardandsmith.com
Liaison Counsel for Plaintiffs

/s/ A. Charles Ellis

A. Charles Ellis (N.C. Bar No.: 010865)
Ward and Smith P.A.

Post Office Box 8088 Greenville,
NC 27835-8088
Telephone: (252) 215-4000
ace@wardandsmith.com
Liaison Counsel for Plaintiffs